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MOSER LAW FIRM, PC



June 14, 2022

VIA ECF

Hon. Pamela K. Chen, USDJ
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Collazos v. Garda CL Atlantic, Inc.*, Case No. 21-cv-02095 (PKC)(JRC)

Dear Judge Chen:

I represent the Plaintiff in the above referenced action. I write to request a stay of the Defendant's Motion to Compel Arbitration for one week (until June 21, 2022). The reasons for this request are (1) the CV of Plaintiff's expert, Nydia Flores, was inadvertently omitted from the documents filed via ECF, (2) the Plaintiff will be requesting that the Court strike Defendant's motion to compel arbitration in its entirety as it is based on inadmissible documents, and (3) the Plaintiff will be either moving to either strike or oppose the portions of Defendant's reply that improperly include a motion for further relief. More specifically, TCFI states on page 3 of its reply (ECF No. 19) that "TCFI moves to strike Flores' expert report under FRCP 26(a)(2) and 37(c)(1)." The reply was unaccompanied by a notice of motion, however and therefore the request is procedurally infirm.

Respectfully submitted,

Steven J. Moser

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CC: All counsel of record via ECF